UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CHARLENE CARTER,	§	
	§	
Plaintiff,	§	
	§	
V.	§	
	§	
SOUTHWEST AIRLINES CO., AND	§	CIVIL CASE NO. 3:17-CV-
TRANSPORT WORKERS UNION OF	§	02278-X
AMERICA, LOCAL 556,	§	
	§	
	§	
Defendants.	§	
	§	
	§	
	§	

LOCAL 556'S UNNOPPOSED MOTION TO EXTEND DEADLINE

Defendant TWU Local 556 seeks extension of their deadline to file a motion in *limine* from **Monday, June 20 at 5pm to Wednesday, June 23 at midnight**. All parties have confirmed they are not opposed.

- 1. During the June 16, 2022 pre-trial conference, the matter of Defendant SWA's first motion in *limine* point was discussed:
 - 1. Southwest asks the Court to limit testimony and evidence related to Southwest's treatment of other employees.
- 2. Plaintiff argued that the evidence was not related to SWA, "Instead, Carter seeks to introduce evidence of employee discipline to demonstrate Local 556 representatives' knowledge of and involvement in efforts to discipline recall supporters, nonmember objectors, and other union

opponents, which is directly relevant to Carter's RLA, Duty of Fair Representation, and Title

VII claims against Local 556."1

3. As such, the Court afforded Defendant Local 556 an opportunity provide a brief of the matter,

limited to 7-pages, with Defendant SWA allowed to join. The brief was ordered due by

Monday, June 21 at 5pm.

4. Early Monday morning, lead counsel for Local 556 rushed his infant daughter to the emergency

room with respiratory issues. To date of this filing, the baby remains hospitalized and

connected to oxygen machines. As lead counsel is in control of the briefing, it has not been

finalized. Local 556 anticipates being able to submit briefing by Wednesday, June 23 at

midnight.

5. All parties expressed they were unopposed with the extension on Monday, June 21. This

request is not for delay, but in the name of equity and compassion.

Dated: June 21, 2022

/s/ Edward B. Cloutman, III_____

Edward B. Cloutman, III

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Respectfully submitted,

/s/ Adam S. Greenfield

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ATTORNEYS FOR DEFENDANT TWU LOCAL 556

CERTIFICATE OF CONFERENCE

I hereby certify that the parties conferred on this motion via email on the morning of

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¹ Doc. No. 254 at 2.

Monday, June 20, 2022.	
	/s/ Adam S. Greenfield
Adam S. Greenfield	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been filed via the Court's ECF system and all counsel of record have been served on this 21st day of June, 2022.

/s/ Adam S. Greenfield
Adam S. Greenfield